

Attachment G-1
Plaintiff's List of Documentary and Physical Evidence

No.	Document
1	Job history, K.C. Marks
2	Performance Payment Award, 5/24/2001
3	Marks Performance Evaluation, June 8, 2001
4	City of Atlanta Job Description, Public Works Manager
5	2003 Organization Chart – Public Works-Administration
6	Letter from Mary Ann Johnson to Wanda Blackwell, 2/7/2003
7	City of Atlanta 2003 Budget (excerpts)
8	City of Atlanta 2003 Budget Mid-year Review
9	Email from Owens to KC Marks, 6/05/2003 re Yard Waste Statistics
10	Email from Griffin to Marks, 6/05/2003 re: Cabbage Town Initiatives MOU
11	Memo from Marks to Owens, 6/9/2003 re: Yard trimming statistics
12	Letter from Ga. Dept. of Natural Resources to K.C. Marks, 6/6/2003 re: Municipal Solid Waste Landfills
13	Memo from Marks to Owens, 7/23/2003 re: demolition estimate
14	Special Events 2003 chart
15	Department of Public Works/Sold Waste 2004 Proposed Budget
16	Major Operating Budget Issues 2004

17 Memo from Owens to Moraitakis, 7/14/2003 re: Garbage Collection Services

18 Department of Public Works 2004 Equipment Replacement and Requirement Schedule for Solid Waste Services

19 Mayor's Dashboard Reports, 2003

20 Department of Public Works employee lists, 8/15/03

21 Calendar for year 2003

22 Notice of Proposed Adverse Action, 8/11/2003

23 Supplementary Form, Notice of Proposed or Final Adverse Action

24 Notice of Final Adverse Action, 8/22/2003

25 City of Atlanta QPAI Manual

26 Memorandum from BPC to CSB, 12/16/2003 re: Marks five-day suspension

27 Unsigned and undated reprimand with attached Personnel Transaction and Certification signed by Owens 8/25/03

28 Memorandum to Scott from Johnson, 8/31/2003, re: K.C. Marks III Notice of Appeal

29 Memorandum from David Scott to Adam Smith, September 12, 2003, re: Recommendation for award of Emergency Contract C-513

30 Draft City-Consultant Agreement, C-513, Emergency Yard Collection and Grass Cutting Services

31 Memorandum from David Scott to Adam Smith, October 23, 2003, re: WCC Landscape Maintenance

32 Emergency Contract C-513A, Emergency Yard Trimmings and Grass Cutting Program

33 Memorandum from Owens to Marks, 9/29/2003, re Leave Request

34 Department of Public Works Leave Request Form submitted by K.C. Marks & signed by Owens 9/29/2003

35 Department of Public Works Leave Request Form, signed by Donna Owens 10/1/2003

36 Notice of Proposed Adverse Action of discharge signed by Owen 10/21/2003

37 Phone Memo to Comm. Scott from K.C. Marks, 10/22/2003

38 Letter to Marks to Scott, 10/23/2003

39 FMLA Request forms dated 10/14/2003

40 Certification of Serious Health Condition signed by Allen C. Carter, Ph.D., 10/22/2003

41 Letter from Johnson to Marks dated 12/22/2003, approving FMLA leave through 1/6/2004

42 Letter from Marks to Scott, 12/28/2003, requesting extension of leave

43 Pl. Ex. 17 Certification of Serious Health Condition signed by Allen C. Carter, Ph.D., 12/17/2003

44 Calendar for year 2004

45 "Phone Memo" to Donna from K.C., 1/5/0[4]

46 Letter from Johnson to Marks, 12/22/03, with handwritten note to "Evelyn"

47 Letter from Mary Ann Johnson to Marks, 1/8/2004

48 Letter from Scott to Marks, 1/8/2004

49 Notice of Proposed Adverse Action, 1/22/2004

50 Letter from Marks to Owens, 1/27/2004, with Express Mail receipt stamped 1/28/2004

51 Facsimile from Adkinson to Huber , February 4, 2004, with Notice of Proposed Adverse Action and attachments

52 Letter from Huber to Scott/Owens, 2/6/2004

53 EEOC Charge #110-2004-01766, stamped “received EEOC-ATDO 2/6/2004”

54 Fax to Evelyn Atkinson dated 2/10/2004, with handwritten note

55 Notice of Final Adverse Action, discharge, 2/10/2004

56 Personnel Transaction and Certification, 2/10/2004

57 Separation Notice dated 2/10/2004, for Dismissal – Abandonment of Job

58 Memo from Elder to Graham-Adkinson re Notice of Charge of Discrimination, February 23, 2004

59 Memorandum to Alfred Elder from Evelyn Graham-Adkinson, re: Discrimination Complaint, March 22, 2004

60 Letter to EEOC from Alfred Elder, 4/12/2004

61 Position statement, Enclosure (1) to letter to EEOC, 4/12/2004

62 Sanitation Field Superintendent Advertisement, Enclosure (1) to Elder letter to EEOC, 4/12/2004

63 Printout of computer screen, K.C. Marks III, with handwritten notes of job titles and dates

64 Letter to EEOC from Elder, 5/10/2004

65 Position Statement, Enclosure (1) to letter to EEOC from Elder,
5/10/2004

66 EEOC Determination, 6/8/2004

67 Letter from David Scott to Donald Murray, November 25, 2003, re:
discharge from employment

68 Personnel Transaction and Certification promoting James Swope to
Public Works Manager

69 Personnel Transaction and Certification promoting James Swope to
Public Works Manager, Sr.

70 Letter from Alfred Elder to EEOC, 7/20/2004, requesting
reconsideration of cause finding

71 Letter from Mary Ann Johnson to Ladun Esan, May 18, 2004,
approving Family and Medical Leave through July 21, 2004

72 Email from Ladun Esan to Betty Harris, 7/21/2004

73 Letter from David Scott to Ladun Esan, 07/29/2004 re failure to
contact supervisor by required date and failure to request additional
leave

74 Internal emails Concerning Ladun Esan, dated August 16, 2004

75 Notice of Proposed Adverse Action of Dismissal to Ladun Esan

76 Personnel Transaction and Certification, Oladunjoye Esan, placing
Esan on suspension with pay

77 Personnel Transaction and Certification, Oladunjoye Esan, employee
returned from Family and Medical Leave effective 8/16/2004

78 Marks pay stubs, 9/29/03 to 12/11/2004

79 COA payroll screens for K.C. Marks III

80 City of Atlanta Family and Medical Leave policy, HR 4.05

81 City of Atlanta Code 114-76 to -87.

82 Attendance and Sick Leave ordinances, City of Atlanta

83 City of Atlanta Code, Grievances, 114-516 to 532

84 City of Atlanta Code, Disciplinary Action, 114-546 to 556

85 City of Atlanta Employee Handbook

86 Excel sheet showing value of backpay and benefits

87 Excel sheet showing interest on backpay, computed quarterly

88 City of Atlanta Ordinance 03-O-1855, approved November 24, 2003

89 City of Atlanta Classification and Salary Schedule, July 2004

90 City of Atlanta Classification and Salary Schedule, February 3, 2005 revisions

91 City of Atlanta Classification and Salary Schedule, October 2005 revisions

92 City of Atlanta Classification and Salary Schedule, August 2006 revisions

93 City of Atlanta Ordinance 04-O-0068, providing for 2% COLA for all City employees effective July 1, 2004

94 City of Atlanta Ordinance 04-O-1921 providing for 1% COLA for certain City employees effective 1st pay period of 2005 budget year

95 City of Atlanta Ordinance 05-O-2269 providing for 2.2% COLA for all City employees, effective 1st pay period of 2006 budget year

96 Report of Paul Wright, with supporting calculations

Plaintiff reserves the right to introduce any document or exhibit listed on Defendant's Attachment G-2.